

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

v.

SERGEY SHESTAKOV,

Defendant.

No. 23 Cr. 16 (JHR)

ORAL ARGUMENT REQUESTED

DEFENDANT SERGEY SHESTAKOV'S NOTICE OF MOTIONS *IN LIMINE*

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law dated July 2, 2024 and all other papers and proceedings herein, Defendant Sergey Shestakov, by and through his undersigned counsel, hereby moves this Court, before the Honorable Jennifer H. Rearden, at a date and time to be set by the Court, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, for an Order (1) precluding the government from referencing or referring to (implicitly or explicitly) Charles McGonigal's guilty plea; (2) admitting all relevant portions of Mr. Shestakov's recorded meeting with the FBI on November 21, 2021 for completeness or as evidence of Mr. Shestakov's state of mind; (3) precluding the government from offering irrelevant and highly prejudicial evidence concerning Russia and/or purported ties to Russian intelligence; (4) precluding irrelevant evidence and hearsay testimony concerning inflammatory allegations.

Dated: July 2, 2024
New York, New York

Respectfully submitted,

/s/ Rita M. Glavin

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